

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION AT DAYTON

UNITED STATES OF AMERICA,	:	
Plaintiff,	:	Case No. 3:18-CR-00186
	:	
vs.	:	JUDGE THOMAS M. ROSE
	:	
BRIAN HIGGINS	:	
Defendant.	:	

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**MOTION TO FILE UNDER SEAL**

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Now comes the undersigned Counsel for Defendant, Brian Higgins, and respectfully moves the Court for an Order permitting Counsel to file Under Seal, a Motion regarding the Defendant.

**MEMORANDUM IN SUPPORT**

As grounds for this request, this case has drawn public attention and is reported on in the Dayton Daily news. The Motion that Counsel intends to file is not considered newsworthy and concerns an issue entirely unrelated to the case, facts and indictment. In the respectful opinion of Counsel, the intended Motion should not have public access.

Respectfully submitted,

/s/Tamara S. Sack  
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CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing Motion utilizing the United States District Courts' E-Filing CM/ECF system on the 21st day of July 2021.

/s/Tamara S. Sack

Tamara S. Sack